

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED _____
	:	
ROBERTO SANTOS-ESTRELLA	:	VIOLATION: 8 U.S.C. § 1326(a) and (b)(2) (Illegal Re-entry After Deportation - One Count) Notice of Prior Conviction

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 15, 2003, at Philadelphia, in the Eastern District of
Pennsylvania, the defendant

ROBERTO SANTOS-ESTRELLA,

an alien and subject of the Dominican Republic, who had previously been deported from the
United States on or about September 15, 1997, was found in the United States, having knowingly
and unlawfully re-entered the United States without first applying to the Attorney General of the
United States or his successor, the Secretary for Homeland Security (Title 6, United States Code,
Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in
response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

NOTICE OF PRIOR CONVICTION

Notice is hereby given that, on or about October 6, 1994, the defendant

ROBERTO SANTOS-ESTRELLA

was convicted in New York state of criminal possession of a controlled substance in the second degree, to wit, cocaine, a crime the maximum punishment for which exceeds one year, for which offense he was sentenced to four years to life imprisonment.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney